



## INTEROFFICE MEMORANDUM

DATE: September 16, 1999

TO: J. P. Floerke, K-H, Bldg 111 , X2850

FROM: S. M. Nesta, K-H/ESS, T130C, X6386 *SMBesta*

SUBJECT: NEPA DETERMINATION FOR - SMN-119-99

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I have reviewed the project to deactivate the Bldg 371 Cluster. I understand that the project is to remove equipment, materials, and wastes, and perform other minor activities to place the facilities in a safe condition, pending decommissioning activities.

Note that under section 12 of the checklist (RCRA), it says a closure description document (CDD) will be prepared for D&D (presumably in the building DOP) and that the Part B CDD will be used for closures during deactivation. The Part B only contains the Closure Plan, and the facility will need to prepare a CDD specific to units that will be closed during deactivation. The remainder of the closures can be conducted under the CDD included in the DOP.

Several other items that were not addressed in the EC, but that need to be considered prior to starting project activities include, identification of waste storage areas, the potential impact of deactivation activities on decommissioning activities (e.g., removal or modification of ventilation systems would impact PuSPS operations), and if up-front waste certification can be resurrected for shipments of waste directly from B371. Comments and issues regarding air quality are identified on the attached pages. No other regulatory compliance issues are noted at this time.

I have also concluded that the proposed project receives adequate NEPA documentation from the Site Standing Categorical Exclusion for Deactivation of Site Buildings (RFFO/CX 2-97), and that no further NEPA review or documentation of the project is necessary. From a NEPA perspective, the project may proceed.

If changes arise that alter the scope of the project, or if you have questions or need additional information, please contact me at X6386.

cc:

Karan North, K-H  
Bill Wierzbicki, SSOC  
Ted Hopkins, RMRS  
file

ADMIN RECORD

- SAFE AND COMPLIANT CLOSURE -

B371-A-000143

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## INTEROFFICE MEMORANDUM

DATE: September 10, 1999

TO: S. M. Nesta, Environmental Systems and Stewardship, T130C, X6386

FROM: *CAPatnoe*  
C. A. Patnoe, Environmental Systems and Stewardship, T130C, X2440

SUBJECT: BUILDING 371 CLUSTER CLOSURE PROJECT - DEACTIVATION PHASE –  
CAP-150-99

Ref: Letter number SMN-111-99 from S. M. Nesta to distribution entitled "Building 371 Cluster Closure Project-Deactivation Phase", and attached Environmental Checklist

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Per your request, Air Quality Management (AQM)/Radian International has reviewed the deactivation phase of the Building 371 Cluster closure project for air regulatory issues. The following air regulatory requirements will apply, or could apply to the principal deactivation activities listed in the environmental checklist:

Colorado Air Quality Control Commission Regulation No. 1 (CAQCC Reg. 1) regulates particulates and smoke. Section II. A. 1 (smoke and opacity) will apply to any non-electric compressors, pumps, or generators used in conjunction with Building 371 Cluster deactivation activities. Emissions from the compressors, pumps, or generators must not exceed 20% opacity.

CAQCC Reg. 3 regulates air pollutant emissions for all Colorado industries. The provisions of this regulation identify criteria air pollutants and hazardous air pollutants, establish air pollutant emission notice (APEN) thresholds for these regulated air pollutants, and set forth both construction and operating permit application guidelines. Non-electric compressors, pumps, or generators used in conjunction with Building 371 deactivation activities may have APEN and permitting requirements. Fuel usage for any non-electric compressors, pumps, or generators used in conjunction with Building 371 Cluster deactivation activities must be tracked and provided to Air Quality Management.

CAQCC Reg. 7 regulates emissions of volatile organic compounds (VOCs). It could apply to the removal of VOC liquids from tanks in the Building 371 Cluster, or to the use of solvents in vapor degreasers or cold cleaners for degreasing or cleaning as part of the deactivation process.

- Reg. 7, Section III requires that transfers of VOC compounds to a tank with a capacity of 56 gallons or larger utilize bottom filling or submerged fill technology.
- Reg. 7, Section V requires that VOCs not be disposed of by evaporation or spillage.

40 CFR 61, Subpart H (CAQCC Reg. 8, Part A, Subpart H) regulates radionuclide emissions other than radon from Department of Energy facilities.

- Section 61.92 requires that emissions of radionuclides to the ambient air from Department of Energy facilities shall not exceed those amounts that would cause any member of the public to receive in one year an effective dose equivalent (EDE) of 10 millirem (mrem). The Site maintains a Radioactive Ambient Air Monitoring Program (RAAMP) sampler network to demonstrate compliance with this requirement.
- Section 61.93 establishes radionuclide air monitoring and testing protocols and requires that significant radionuclide emission points be monitored. Currently, Building 371/374 emission points 371-SSS, 371-N01, 371-N02, and 374-MAI are significant radionuclide emission points, and are continuously monitored for effluent radionuclide air emissions. If methodologies utilized to perform principal deactivation activities, such as removal of special nuclear material holdup in gloveboxes, piping, and tanks; Raschig ring removal; or material sampling and characterization, result in a potential to emit radionuclides to any exhaust vent other than the above listed emission points, the activities will have to be evaluated to determine whether new continuous radionuclide air monitoring requirements will apply.
- Section 61.96 requires that each new or modified source that has a potential to emit radionuclides be evaluated for radionuclide air emissions. Notifications of start-up and applications for approval must be submitted to EPA and CDPHE for new or modified sources with estimated controlled radionuclide air emissions that exceed 0.1 mrem per year EDE.

CAQCC Reg. 15 regulates emissions of ozone-depleting compounds (ODCs). Reg. 15 will apply to the refrigerant removal activities. All ODCs must be recovered by certified technicians into an approved recovery vessel by an approved method.

Please contact Mike Putney of Radian International at X2692 for any questions regarding this analysis.

MTP

cc:

M. Hyder (Radian)

M. Putney (Radian)

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